

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
The Use of N11 Codes and Other)	CC Docket No. 92-105
Abbreviated Dialing Arrangements)	

REPLY COMMENTS OF THE KENTUCKY TRANSPORTATION CABINET

The Kentucky Transportation Cabinet (KYTC) hereby submits its Reply Comments to the Comments filed to refresh the record regarding reconsideration of the Commission's designation of the 211 and 511 abbreviated dialing codes. The KYTC was the first Agency to implement a N11 Traveler Telephone Information service which went on line November 20, 1995 and served the Kentucky portion of the Cincinnati/Northern Kentucky Metropolitan area. The Kentucky Public Service Commission (KPSC) provided the authority by an order dated June 21, 1995.

Currently, the KYTC has implemented three separate telephone information systems which are serving travelers in many ways. The first system is noted above and has been expanded to cover the entire Metropolitan area with traffic, transit, ridesharing, airport access and special event information. Three Kentucky Counties are covered in the service area. This is a joint effort with the Ohio Department of Transportation.

The second system serves the remaining 117 Kentucky Counties with traffic and weather condition information. The database covers 2,800 miles of Interstate, Parkway and National Highway System Highways. This System went on line November 27, 2002.

The third system provides premium service tourist information for 45 Counties in Southern and Eastern Kentucky. The service area coincides with Counties represented at one time or another by Congressman Harold (Hal) Rogers. Access is via a menu item in the Statewide System noted in the above paragraph.

On July 9, 1999, the KYTC submitted comments to the FCC supporting the USDOT petition for a N11 Dialing Code for transportation information. Several points regarding N11 service in Kentucky were presented in detail. We are summarizing several of these comments in the bullets that follow. Note that the dialing code in use at the time of the survey was 211, later changed to 511.

- 99% of users stated that they benefited by the traveler information obtained by calling 211.
- Users rated the ease to access traveler information by dialing 211 very high.

- 65% of users said they were willing to pay for 211 service with \$0.25 per call being the average amount they were willing to pay.
- Some users were willing to pay as much as \$3.00 per 211 call.
- Users made an average of 19 trips annually to other cities where they needed traveler information and would have used 211, if available.
- Users also made an average of 19 trips per year in rural areas where they needed traveler information and would have liked an easy to use, known, national number to call.
- 80% of users stated that they would benefit from a national N11 dialing code, as they would not have known local numbers.
- On a per capita basis, Kentucky callers made 72.7% more calls to a N11 Dialing Code seeking traffic information than Ohio callers made to 333-3333 for the same information.

The KYTC has no knowledge that the Kentucky Public Service Commission (KPSC), landline carriers, cell/wireless carriers have received any requests for the right to use 511 for any purpose. We also must point out that the KPSC has declared all N11 numbers to be a “scarce public resource” which should be reserved for “public purposes” (Order, Administrative Case 343, November 5, 1993).

Kentucky is joined by seven border States. We are committed to working out call transfer arrangements with each of the seven States. There will be no “we got here first, you work things out” attitudes. The KYTC has signed an agreement with Verizon Wireless which states, among other things, that we will resolve all Stateline border issues at the switch level. We would have signed similar agreements with other carriers, however, none were requested. We have implemented 511 with all known landline, cell/wireless, CLEC’s and pay phone carriers without receiving the first complaint. Neither have we complained to the carriers. In fact, we have found a programming glitch in the operating software of two wireless carriers. Upon notification, both carriers moved quickly to remove the glitch.

The KYTC, pending the availability of funds, desires to expand its 511 database both geographically and in quality.

The KYTC knows of no other proposed or actual traveler telephone information service in Kentucky much less have had a negative impact on such services.

In conclusion, the KYTC considers that our three separate traveler telephone information services provide an excellent level of service to all travelers. Our services aren’t perfect but if the FCC would like to see how useful our services are, just give us a call on the day after our first significant snow/ice storm this Winter. We have crashed our Statewide

system at least once during the past two Winters but we now have sufficient ports available this Winter to actually test our system to the fullest.

The KYTC welcomes this opportunity to comment on one of the most useful tools in getting information to travelers as we satisfy requests received through several focus groups.

Any questions or comments should be addressed to Leon Walden, 511 coordinator for the Kentucky Transportation Cabinet, 502-564-3020 or leon.walden@ky.gov.